

Code of Conduct for Suppliers

Nedal Aluminium B.V.

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COMMITMENT

Nedal Aluminium B.V. recognises that our supply chain activities can have wide ranging social and environmental impacts and that our responsibility extends beyond our own operations, into our supply chain.

We are committed to socially and environmentally responsible procurement and have set high standards for the way we do business so our customers and other partners know we can be trusted.

Our business mindset requires that we work only with Suppliers who have the ability to consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own.

This commitment is reflected in our Supplier Code of Conduct (“Code”), that sets out the minimum standards of behaviour we require of our Suppliers.

We ask our Suppliers to not just comply with the Code, but to use reasonable endeavours to exceed it and promote continual improvement throughout their business operations.

The United Nations Sustainable Development Goals (SDGs) invite action from the private sector to address some of the world’s most pressing development issues. Situated in a broader ethical sourcing framework, our Supplier Code of Conduct is one way Nedal Aluminium B.V. aligns with the SDGs

APPLICATION AND ACCEPTANCE

The Code is applicable to all contract Suppliers and business partners, who are expected to cascade these requirements to their own supply chain.

Sustainability and compliance with this Supplier Code of Conduct are part of the criteria *Nedal Aluminium B.V.* uses during Supplier selection, and this Code is applicable to all of our Suppliers and their affiliates. Suppliers must diligently provide official answers, documents, certificates related to sustainability as soon as it is requested by Nedal Aluminium B.V..

Adhering and signing this Code of conduct is therefore a requisite to do business with *Nedal Aluminium B.V.*.

ASSESSMENT

By adhering to this Supplier Code of Conduct, each Supplier accepts to be assessed or audited by *Nedal Aluminium B.V.* or by a third party mandated by *Nedal Aluminium B.V.* .

In case of violation of this Code of Conduct, *Nedal Aluminium B.V.* will determine corrective actions with the violating Supplier which can include termination of our business relationship.

QUESTIONS

Suppliers may raise any concern or questions by sending an email at the following email address:

michielvanrietschoten@nedal.nl .

We will provide guidance when requested.

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GOVERNANCE & ETHICS

***Nedal Aluminium B.V.* conducts its business in accordance with the highest standards of ethical behaviour and in accordance with all applicable laws and regulations and expect its business partners to do the same.**

1. Compliance
 - Suppliers must comply with all applicable local laws and regulations, in all the countries in which they operate.
2. Management System, transparency and disclosure of information
 - In order to be able to prevent or report any issues on application of laws or of this Code of conduct, Suppliers should have a formal system to establish rules and indicators, keep records and trigger corrective actions, endorsed by senior management of the Supplier.
 - Suppliers shall at any moment and upon request of *Nedal Aluminium B.V.* or other appropriate parties be able to disclose information and performance indicators on business activities, Labour, health and Safety and environmental practices.
 - Suppliers shall also make available financial statements in accordance with accounting principles and local laws.
3. Business integrity, anti-corruption and anti-Bribery policy
 - Supplier shall not be involved directly or indirectly in any scheme of bribery, kickbacks, extortion, corruption and similar prohibited business practices.
 - Suppliers shall have written policies prohibiting these practices and shall train employees and subcontractors accordingly (or equivalent measures)
 - In particular, these policies shall include possibilities for workers to report misconducts without fear of retaliation.
 - Suppliers shall keep records and be able to provide evidences of the compliance with this section.
4. No improper advantage
 - Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage.
 - Any business courtesy (meals, company gifts and entertainment) must be of reasonable value and frequency according to local business practices.
5. Conflict of interest
 - Suppliers shall avoid any situation where a Supplier 's employee has a privileged information or relationship (eg: family relation) with a *Nedal Aluminium B.V.* employee who can influence or make decisions favouring the Supplier's business. Such situations must be disclosed by the Supplier.

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6. Fair business and competition

- Supplier does not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern the jurisdictions in which it conducts business.

7. Intellectual property and confidential information

- Supplier respects the intellectual property rights of others.
- Supplier takes appropriate steps to safeguard and maintain *Nedal Aluminium B.V.*'s confidential and proprietary information.

8. Data Protection

- Suppliers shall ensure it complies with the data protection laws and particularly the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), where applicable.

9. Responsible Sourcing and Conflict Minerals

- Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to Nedal Aluminium B.V. on request, in order to make sure there is no conflict with applicable laws or this Code.
- Suppliers that are sourcing raw materials such as the tantalum, tin, tungsten and gold (known as "conflict minerals") shall ensure that this trade does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.

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LABOR AND HUMAN RIGHTS, HEALTH & SAFETY

Nedal Aluminium B.V. is committed to uphold human and labour rights of workers, and to treat them with dignity and respect as understood by the international community, in the proper conditions of health and Safety. We require our Suppliers to also commit to these values.

1. Prevention of Child Labour & Young Workers
 - Child labour should not be used at any level of the supply chain in accordance with the Convention of the International Labour Organization.
 - Young Workers, those under 18 years of age, shall not perform work that is likely to jeopardize their health or safety nor interfere with their education.
2. Humane Treatment and anti-harassment
 - There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.
3. Anti-discrimination
 - Suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership.
 - This applies for recruitment, salary, promotion or termination matters.
4. Voluntary Employment
 - Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour shall not be used Suppliers.
 - Suppliers shall not be complicit to any form of slavery or human trafficking.
5. Working Hours, wages and benefits
 - Suppliers shall follow all applicable laws with respect to working hours, wages and benefits.
 - Workers shall not be required to work more than 60 hours per 7-day week, including overtime, and shall be allowed at least one day off every seven days.
 - Overtime shall be compensated at the prevailing overtime rates.

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6. Freedom of Association and Collective Bargaining

- Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

7. Health & Safety

- Suppliers shall ensure a safe and healthy work environment, by evaluating and managing occupational health and safety hazards.
- Suppliers should establish Occupational Health & Safety leadership and management system, including emergency plans, response procedures and corrective actions.
- Suppliers shall provide workers with appropriate personal protective equipment training on their use.
- Suppliers shall comply with the European REACH regulation.

ENVIRONMENT

Nedal Aluminium B.V. is committed to environmental protection and to conduct business in an environmentally sensitive manner and wants its Suppliers to do the same

1. Management system

- Suppliers shall have systems in place to ensure safe management of waste, air emissions and wastewater discharges, eventually integrated with the Health and Safety management system.

2. Environmental Permits and Reporting

- All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

3. Resource Reduction

- Suppliers are committed to ensure the efficient use of resources and ensure that waste of all types are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

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4. Greenhouse Gas Emissions and Energy Consumption

- Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

5. Waste Management

- Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

6. Wastewater generated from operations,

- Industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.

7. Hazardous Materials Chemicals and other materials posing a hazard

- Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.
- If released to the environment these products are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

8. Product Content Restrictions

- Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

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The undersigned acknowledges their understanding of, and their compliance with, all applicable laws and the above *Nedal Aluminium B.V.*.

Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance.

Nedal Aluminium B.V. reserves the right to terminate its business relationship with any Supplier who is unwilling to comply with this Code.

Statement of Responsibility

----- (name of company), a company legally constituted in (name of country)
with registration / license number , -----

hereby declares that it:

- (a) understands and accepts the content of the Code, included with this Statement of Responsibility;
- (b) will share, with Nedal Aluminium B.V. and its own network of Suppliers, those efforts, difficulties and achievements in implementing this Code ;

(place) , DD/MM/YYYY

(Name and position, Signature, official stamp of company)

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